

**Senate  
General Government Committee  
Interested Party Hearing  
May 27, 2025**

**In-Person Testimonies**

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## Summary of SB153 Short Falls and Solutions through Proposed Amendments

### SENATE BILL 153 FALLS SHORT IN ENHANCING OHIO'S CRITICAL INFRASTRUCTURE ELECTIONS

#### Interested Party Testimony

May 27, 2025

Good afternoon Chair Roegner and members of the Committee,

I am Gail Niederlehner and I live in Butler County. I appreciate the opportunity to provide interested party testimony on Senate Bill 153 (SB153). I support efforts to safeguard Ohio's elections while advocating for improvements to ensure they are secure, accurate, transparent, and compliant with federal law.

#### Concerns Over Gaps in Ohio Election Law

Ohioans are alarmed that state law allows noncitizens and those without a valid ID to register and vote without adequate verification.

While I commend the sponsors for taking steps to safeguard Ohio's elections, this bill contains serious short falls. Without key amendments, SB153 – like HB458 before it – will fail to ensure only eligible citizens register and vote.

#### House Bill 458: A Precedent of Incomplete Reform

Enacted in 2023, HB458 was promoted as a strict voter ID law. However, it allows mail-in voting without a photo ID, enabling over a million votes in 2024 without true verification. While it "closed the front door" by requiring photo ID for in-person voting, it "left the back door open" for potential abuse.

#### Key Short Falls in SB153

##### #1 Fails to Verify Citizenship Before Registration

SB153 closes the front door by requiring proof of citizenship to vote, but leaves the back door open by not requiring proof of citizenship to register to vote. Over 305,000 noncitizens have valid Ohio IDs and are registered to vote at the BMV unless they sign a form. Without pre-registration verification, the risk of noncitizen registration continues.

##### #2 Fails to Verify Citizenship for All Against Relevant Databases

SB153 closes the front door by requiring a cross-check of ID to BMV records verifying citizenship, but leaves the back door open by not requiring a similar cross-check of SSN registrations. In 2024 alone, 62,000 registered this way, and 900,000 in the last 14 years. Due to the lack of relevant database access, voters and election officials are unnecessarily burdened with handling proof of citizenship documents, increases the risk of noncitizens remaining incorrectly verified.

##### #3 Fails to Verify Citizenship Unless There is a Name or Address Update

SB153 closes the front door by requiring citizenship verification of all new and existing registrants with BMV records, but leaves the back door open by failing to verify citizenship of voters with SSN, invalid IDs, or no ID unless they change their name or address. In 2024 alone, 39,000 voters registered using invalid SSN information – under SB153, none of them are subject to citizenship verification unless they change their name or address.

##### #4 Fails to Require Adequate Proof of Citizenship Documents

SB153 closes the front door by requiring a proof of citizenship to vote, but leaves the back door open by accepting expired and out-of-state documents - rubberstamping verification by sight inspection without cross-checking relevant databases.



#### **#5 Fails to Conduct a Comprehensive Monthly NonCitizen Review**

SB153 closes the front door by requiring a recurring review to identify noncitizens with BMV records, but leaves the back door open by failing to identify noncitizens registered with SSN, invalid ID numbers, or no ID – without checking relevant databases.

#### **#6 Fails to Comply with Federal Identity Verification Requirements**

SB153 closes the front door by requiring new registrants with an invalid ID to vote provisional, but leaves the back door open by allowing persons with invalid IDs to register to vote – contrary to the Help America Vote Act (HAVA) that requires applicants register with their valid driver's license or state ID if they have been issued one, or SSN if not.

#### **#7 Fails to Provide Boards of Elections Access to Authoritative Data**

SB153 closes the front door by requiring Boards of Elections (Boards) to verify identity and citizenship to vote, but leaves the back door open by allowing a sight inspection of a copy of proof of citizenship without access to databases or true verification. Additionally, under HAVA, Boards must 'verify' provisional voters - yet lack the tools to do so adequately.

#### **#8 Fails to Require a Verified Birth Date to Vote**

SB153 closes the front door by placing registrants with invalid IDs in provisional status, but leaves the back door open by allowing provisional votes to count from voters with an invalid birth date, including January 1, 1800.

#### **#9 Fails to Require Petition Signer's to be Eligible to Vote a Regular Ballot**

SB153 closes the front door by requiring petition signers be registered when signing, but leaves the back door open by allowing signatures to count without eligibility verification - such as those with invalid IDs. In addition, a Secretary of State directive clears all registration issues once a petition signature is accepted, permanently bypassing verification.

#### **Conclusion**

SB153 As Introduced does not provide sufficient safeguards to ensure only eligible citizens vote in Ohio elections. However, its weaknesses can be addressed through targeted amendments. My written testimony outlines these short falls and offers practical, amendment-based solutions.

Numerous Interested Parties provide testimonies detailing concerns and meaningful amendments. We urge you to adopt the amendments to help secure Ohio's elections. Without them, SB153 will follow the path of HB458 - closing the front door while leaving the back door open to ineligible persons continuing to register and vote in Ohio.

Thank you for your attention to these important issues. As both Senator Gavarone and Secretary LaRose have rightly stated, even one illegal vote is too many.



## SB153 Falls Short in Enhancing Ohio's Critical Infrastructure Elections

1. **Lack of Verification Tools:** Boards of Elections (Boards) lack access to databases needed to verify voter identity or eligibility - including US citizenship - contrary to President Trump Executive Order (EO) 14248
2. **No Identity or Eligibility Verification BEFORE Registration:** All voter registrations are added to the voter rolls without confirming identity or eligibility - including US citizenship contrary to both SOS LaRose Press Release 8/29/2024 and President Trump EO 14248
3. **Lack of equal treatment under the law:** Voters who register using a driver's license or state id number (DL/ID) are verified for citizenship through Bureau of Motor Vehicle (BMV) records without having to provide documentary proof of citizenship (DPOC); however, voters who register using the last four digits of social security number (SSN4) must provide DPOC even though citizenship could be verified through Social Security Administration (SSA) records
4. **Noncompliance with Federal Law:** Fails to meet HAVA verification standards to process a voter registration, which requires a valid DL/ID; SSN4 may only be used if no valid ID is available [52 U.S. Code § 21083]
5. **Petition Signature Loophole:** Voters not verified as eligible to vote may sign petitions, and under a SOS directive, the registration is reactivated without ever resolving the underlying eligibility issues, such as an invalid ID
6. **Inconsistent Documentary Proof of Citizenship (DPOC) Verification:** SOS uses undisclosed sources to verify DPOC pre-election, while poll workers and Boards must rely on a visual inspection without access to authoritative databases
7. **Limited Use of Available Citizenship Data:** Only BMV records are screened with DHS Systematic Alien Verification for Entitlements (SAVE) used for confirmation; new and existing voters who registered using SSN digits are excluded from this process and must provide DPOC. President Trump's EO 14248 directed the Commissioner of Social Security to make available all relevant federal databases to all state and local election officials.
8. **Lack of Training on DPOC Review:** Election officials and poll workers are not required to be trained to identify or authenticate citizenship documents
9. **No Provisional Ballot for Unverified Citizens:** Voters without verified citizenship may cast regular ballots if they bring DPOC to the polls – placing an unreasonable burden on temporary poll workers to correctly authenticate
10. **Expired Documents Accepted as Verified Proof of Citizenship:** Expired driver's licenses and passports are accepted as verified DPOC, which is inconsistent with private-sector standards and President Trump EO 14248
11. **Out-of-State Licenses Accepted as Verified Proof of Citizenship:** Non-Ohio driver's licenses are accepted as verified DPOC, despite inconsistent citizenship standards across states
12. **No Verification for DPOC Copies Against Official Records:** Copies of proof of citizenship are not verified with source databases, increasing the risk of accepting invalid documents as verified proof of citizenship
13. **No Hearing Process:** No remedy for individuals claiming US citizenship but lacking acceptable DPOC
14. **No Backup Citizenship Database Check:** Lacks a safeguard to correct BOE errors in verifying citizenship
15. **No BOE Authority to Cancel Noncitizens:** Boards are statutorily responsible for managing local voter rolls, but cannot cancel registrations for unverifiable citizens; the SOS centralizes this operation, with no requirement to update local records accordingly
16. **No Tracking of Citizenship Sources:** Fails to record which data source was used to verify citizenship, reducing transparency and accountability
17. **No Prior Registration Cancellation Authorization:** Updated registration forms do not clearly authorize the cancellation of a voter's previous Ohio registrations
18. **No Signature Mismatch Notification:** Boards are not required to notify voters if cancellation requests are denied due to a signature mismatch with a previous registration
19. **Inconsistent Provisional Ballot Standards:** Does not ensure all issues causing a voter to be flagged as provisional be resolved before the provisional ballot indicator is removed from a voter registration record



## Proposed SB153 Amendments to Enhance Ohio's Critical Infrastructure Elections

1. **Verify Eligibility Before Registration:** All new voter registration applicants must have their identity and eligibility verified - including US citizenship - before being added to the voter rolls.
  - Fulfills SOS LaRose public requests in August 2024 to verify US citizenship before adding voters to the voter rolls
  - Aligns with President Trump Executive Order (EO) 14248
  - Complies with federal HAVA law by validating a driver's license if the applicant has one [52 U.S. Code § 21083]
2. **Require Use of Relevant Databases:** All new voter registration applicants must be verified as eligible to vote using the Ohio BMV database, Social Security Administration (SSA) database, and other applicable federal and state databases. This aligns with President Trump EO 14248 directing the SSA Commissioner to make available the SSA database and other relevant federal databases to all state and local election officials.
3. **Verify Eligibility of All Existing Registrations:** Upon implementation, all existing voter registrations must be reviewed – not just those with a BMV record or changes in name or address as in the current bill. Verification must include identity and eligibility (including citizenship), using BMV, SSA and other relevant databases.
4. **Verify Copies of Citizenship Documents Against Databases:** Copies may be easily falsified with modern technology. Before acceptance, copies of DPOC must be cross-verified with relevant federal or state databases to confirm authenticity.
5. **Grant Boards Access to Verification Databases:** Require BOE access to BMV, SSA and DHS SAVE databases to verify identity and eligibility - including citizenship - of applicants and those already registered . Under federal HAVA law, Boards are required to “verify” information provided by provisional ballot voters. This includes verifying a copy of documentary proof of citizenship (DPOC). Boards must be provided with the appropriate tools to legally fulfill their responsibilities.
6. **Close the Petition Signature Loophole:** Prohibit counting petition signatures from individuals who are not verified as eligible voters. Voters in provisional status must provide valid information for their ballot to count, yet petition signatures to potentially change Ohio's Constitution are currently counted, even if the individual is not verified as eligible to vote.
7. **Disallow Expired or Out-of-State IDs as Proof of Citizenship:** Expired driver's licenses, state IDs and passports should not be accepted as valid proof of citizenship, along with other states' driver's licenses, as they cannot be reliably verified. This aligns with President Trump EO 14248.
8. **Codify Training of Boards on Recognizing Valid Citizenship Documents:** BOE officials must be trained to identify the authenticity of the various documents that prove citizenship.
9. **Prohibit Visual Verification of Proof of Citizenship by Poll Workers:** Temporary poll workers should not be responsible for verifying documents presented as proof of citizenship. Verification should be conducted by properly trained BOE officials.
10. **Establish a Hearing Process for Individuals Lacking Acceptable DPOC:** Individuals claiming US citizenship but lacking acceptable documentation should be able to provide alternative evidence of citizenship.
11. **Implement Monthly Voter Roll Reviews to Confirm Citizenship:** Require the SOS to conduct monthly reviews of all registered voters by cross-referencing relevant federal databases and hearing determinations to ensure accurate citizenship verification. If a registrant's citizenship has been previously verified in an earlier monthly review, they are exempt from further reverification.
12. **Authorize Boards to Cancel Unverified Registrations:** Responsibility for canceling registrations of voters whose citizenship cannot be verified should rest with the Boards, not the SOS. The SOS will provide oversight to ensure compliance.
13. **Update Registration Forms to Include Cancellation of Prior Registrations:** Ensure all registration and update forms clearly authorize cancellation of any prior Ohio voter registrations.
14. **Notify Voters if Cancellation Requests are Denied:** Require Boards to notify voters if registration cancellation requests are denied due to a signature mismatch with a previous registration.
15. **Maintain Accurate Provisional Voting Status:** A voter's provisional status must not be lifted unless all underlying issues have been resolved.
16. **No Unfunded Mandate:** Necessary improvements to Ohio's critical infrastructure elections should not be funded by Boards



# HAVA Noncompliance; UOCAVA Proof of Citizenship Exemption, and other Short Falls

**Testimony of William Schuck  
on SB 153 (136 GA)  
Senate General Government Committee  
May 27, 2025**

Thank you for the opportunity to comment on SB 153. I am William Schuck, a Columbus resident, testifying as a private citizen. I don't represent any other party and am not compensated for this testimony.

Verification of voter citizenship is needed. SB 153 contains many good provisions. I'm testifying as an Interested Party to suggest improvements.

## Citizenship Verification

SB 153 (lines 1294-1296) requires voter rolls to include the date on which a voter's U.S. citizenship is first verified. I suggest including, as confidential information, a copy of the document or identify the source of data used to verify citizenship. This would provide a permanent record that election officials can consult if a citizenship question arises in the future, but wouldn't expose private personal information to the public. Include in the public record the type of document or source of data used for verification (e.g., birth certificate, passport, BMV data), but not the document number or other individual identifiers.

## Non-Citizen Review

Comparing BMV and SAVE data (SB 153 lines 1592-1606) improves the non-citizen review, but more can be done. Federal officials are seeking to expand and correlate various federal databases, and other sources of information exist and may become available in the future. The following changes are suggested:

- Require election officials to use whatever reliable documents and data are available, as prescribed by the Secretary of State, to review the citizenship of everyone on voter rolls. Remove all confirmed non-citizens, and mark as provisional those whose citizenship hasn't been ascertained.
- Require public agencies that process voter registrations in addition to non-election duties, including those named in Section 3503.15(B)(1) (SB 153 lines 1355-1368), to obtain citizenship information as a condition of providing service (not as part of voter registration). Send the information to election officials according to Secretary of State rules or agreements and include it in the non-citizen review. This will (potentially) add data not in the BMV database. It works for BMV, so can work for other agencies.

## Registration

HAVA (52 USC 21083(5)(a)) requires a registration for federal elections to include the number of a current and valid a driver's license number (if one exists). SSN4 is secondary to this number, not an alternative to or substitute for it. SB 153 goes partway toward complying with this requirement. The following changes are suggested:

- Saying SSN4 may be used if the voter does not "have" a driver's license/state ID (SB 153 line 1088) can be interpreted to mean the voter doesn't physically possess his/her driver's license/state ID when registering. To eliminate confusion, say if the voter "has been issued" a driver's license/state ID. Use the same language elsewhere as applicable.



- If there isn't a driver's license/state ID, require another form of current and valid photo ID.
- Require SSN4 in all cases (if one has been issued). Widespread theft and use by non-citizens of social security numbers impair the reliability of SSN4 as an identifier, but it can be useful when confirmed by other data.
- In ORC 3503.201(A) (SB 153 lines 2239-2247): (1) state that an application is incomplete if any required information isn't provided to or obtained by election officials; (2) notify an applicant of any deficiency and how to correct it; (3) require election officials to make a reasonable effort to verify the existence, completeness, and accuracy of required information; (4) register/update if this verification is achieved; (5) reject an application if the applicant is verified ineligible or missing required information isn't provided to or obtained by election officials within a specified time (say, 30 days). This approach places eligible applicants on voter rolls, keeps ineligible applicants off voter rolls, and saves later effort to clean voter rolls.

### Absentee Ballots

Currently, voters can apply for and cast an absentee ballot with just SSN4. SB 153 requires a driver's license/state ID number or, if a voter "does not have" a driver's license/state ID, SSN4 or photo ID (lines 3391-3396, 3485-3498, 4270-4276, 4350-4356, 4513-4536). This is deficient for the reasons previously stated. The following changes would strengthen the bill:

- Adapt to absentee ballot procedures (as appropriate) the changes suggested above for registration.
- For uniformity, make corresponding changes at lines 3553-3560, 3887-3892, and 4769-4779.

### Provisional Status

Why does SB 153 exempt federal write-in absentee ballot (FWAB) voters from provisional status based related to proof of citizenship (lines 2262-2268, 2434-2440, 2628-2630, 4470-4476, 4850-4859)? This isn't required by federal law; with certain exceptions not relevant here, UOCAVA (52 USC 20303(b)) leaves FWAB acceptance and processing up to state law. SB 153 allows UOCAVA voters to apply for an absentee ballot with only SSN4 (lines 4351-4356), yet overseas voters not in the military or government service are least subject to elections oversight and accountability. To cast a FWAB, no proof is needed that the voter didn't receive the absentee ballot for which he/she applied. A FAWB voter has the same notice of need to prove citizenship as other voters and has the same opportunity as other provisional voters to provide proof of citizenship. Removing this exception will improve election integrity and not unduly burden FWAB voters.

Two drafting corrections related to provisional status are needed to eliminate overbreadth. In line 2305, after "ballot" insert "by reason of unconfirmed citizenship". In line 2339, delete "under this division" and insert "by reason of unconfirmed address".

### Voter Assistants

To prevent ballot harvesting and increase accountability in delivery of ballots by voter assistants, add the following provisions to Section 3509.05(D) (SB 153 lines 3631-3690):

- Require a voter assistant to be an Ohio resident who is at least 18 years old, to timely deliver ballots with which he/she is entrusted, and upon delivery present photo ID that confirms his/her identity.

- Limit a voter assistant to delivering one ballot (or two ballots) in a given election, and include that affirmation on the voter assistant attestation.
- Require a ballot to be accompanied by a Secretary of State form that explains voter assistant requirements and responsibilities, names the voter assistant, states the relationship of the voter assistant to the voter, authorizes the voter assistant to deliver the voter's ballot, and is executed by the voter.
- If a ballot is timely delivered by a voter representative but any of these requirements isn't met, accept and process the ballot as a provisional ballot. This will provide an opportunity to cure the defect.
- To enable a voter to ascertain if his/her ballot was timely delivered, require a Board of Elections to give a voter assistant a receipt for ballots delivered and post such receipts online by the end of the day, and require a voter assistant to give the receipt to the voter upon request.

Thank you for your attention. I'm happy to take questions.



## Systemic Data Validation Gaps in Ohio Elections

Testimony on Senate Bill 153

Ohio Senate General Government Committee

James Rigano, Springboro, OH

May 27, 2025

Chairwoman Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and Members of the General Government Committee, thank you for the opportunity to testify on Senate Bill 153. My name is Jim Rigano. I am a Springboro, Ohio resident, engineer, and data analyst. Since 2021, I have analyzed Ohio's public voter rolls from the Secretary of State and county boards of elections. As public concern over election integrity grows, SB153 is a vital step, but my findings reveal gaps that must be addressed to ensure trust in our elections.

I commend SB153's efforts to validate voter eligibility and its attempt to prevent duplicate registrations. These are two of my primary concerns about our voter rolls. However, I am concerned the General Assembly may view SB 153 as sufficient and want to encourage you to do more.

Data analysts refer to a concept called "data validation." Data validation is the process of verifying that data is correct and that it is properly entered into a database. Ideally, this is done as the data is entered, but the data can also be screened for problems that need correction after it is entered. Ohio's voter registration databases lack this safeguard, allowing many data entry errors in names, addresses, birthdates, etc., often caused by bad handwriting, to go undetected.

My analysis reveals other systemic problems too, including:

- 962,000 inactive registrants who have not voted in six years, violating Article V, Section 1 of the Ohio Constitution's four-year cancellation rule.
- 3,435 confirmed and up to 14,000 potential duplicate registrations on the voter rolls today, risking double voting.
- 1,015 registrants matching Ohio Department of Health death records.
- 391 voters aged 105 or older indicating incorrect birth dates or deceased persons that should have been removed, like James B Miller who is allegedly 125 years old.
- 190,000 registrations on holidays when boards are closed.
- 255 registrations at invalid addresses, like post offices or The UPS Store.

Data validation that would minimize, or eliminate, these issues should not be cumbersome. It happens in the commercial world every time we do an online transaction. It can happen for voter registration also.



Madam Chair, our county boards of elections do an excellent job of running elections, but they are not computer experts or professional database administrators. Nor should they be. They need help in the form of computer software to perform this validation for them. Ohio has an abundance of data about its citizens and its non-citizens. The State knows my full name, my address, my birth date, my weight, even my eye color. The boards need software to leverage the relevant information, assure proper data entry, and screen for duplicates and eligibility. Please amend SB153 to require robust data validation before the 2026 general election.

SB 153 will improve the quality of the statewide voter registration database. But if you don't demand that counties use the statewide database, it may not have any real impact on elections. In addition to the statewide voter registration database, each county also has a voter database. When I questioned all 88 counties about which database they use to obtain the official list of electors for an election, every county that replied told me they use their own county database to make the list. This is contrary to both Ohio and federal law that require the statewide voter registration database to be the official source for all elections. If the databases were in sync, this would be a technicality. However, some of our largest counties are considerably out of alignment with the statewide database. For example, Hamilton County and the state disagree on whether 1,001 voters exist, Cuyahoga and the state: 8,555 voters, Franklin and the state: 7 voters. These examples are just where there is disagreement about whether the voters' registration record exists. There are also disagreements about the voter's names, addresses, and other data elements.

This bill should also replace the current audit of the statewide voter registration database promulgated in ORC 3503.15 and OAC 111:3-4-5 which is missing scores of problems. The General Assembly should require the Auditor of State to conduct an annual audit of the statewide voter registration database and three counties selected at random. The Auditor should look for the common problems that citizens are finding today and assure that the voter rolls comply with SOS directives and state law.

I have attached suggested legislation for an audit of voter registration databases to my written testimony. And, I can provide the committee with reports I have written about the condition of Ohio's voter rolls if that would be helpful. Thank you, and I'm happy to answer questions.

James Rigano



## **Attachment 1 - Draft legislation for audit of voter rolls by the Auditor of State**

Note: references to section numbers may need to be modified to conform with current law.

### **Sec. 3503.XXX**

(A) Each year, the auditor of state shall conduct an audit of the statewide voter registration database and of three counties' voter registration systems.

(B)(1) The county voter registration systems to be audited in a given year shall be randomly selected based on each county's number of registered electors, as follows:

- (a) One county from the counties representing the top third of all registered electors;
- (b) One county from the counties representing the middle third of all registered electors;
- (c) One county from the counties representing the lowest third of all registered electors.

(2) A county that is audited under division (B)(1) of this section shall not be audited under that division again until every other county in the county's category has been audited the same number of times. This division does not apply to any additional audits conducted under division (D) of this section.

(C) Each audit of the statewide voter registration database or a county voter registration system shall include evaluations of the degree to which each of the following are true:

- (1) Electors' names and addresses are entered in a format that conforms with the requirements of this chapter and of directives issued by the secretary of state.
- (2) Electors' names, addresses, and dates of birth are consistent with the corresponding voter registration applications and update forms and with the records of the bureau of motor vehicles.
- (3) Electors are not registered at residence addresses that are not suitable for use as residence addresses.
- (4) Electors' voter registration dates are accurate, as described in division (C)(9) of section 3503.15 of the Revised Code.
- (5) Electors' dates of birth indicate that they are eligible to vote, are logically consistent with the electors' voter registration dates and voting history dates and are not older than the oldest known United States citizen.
- (6) Electors' registration records are consistent as shown in the statewide voter registration database and the applicable county's voter registration system, and the same electors



appear in the statewide voter registration database and in the applicable county's voter registration system.

(7) Duplicate records are not present in the database being audited.

(8) Electors who are registered at the same address are not assigned to different precincts or voting districts.

(9) The secretary of state or the board of elections, as applicable, complies with the database maintenance procedures described in sections 3503.15 to 3503.153, 3503.201, and 3503.21 of the Revised Code.

(D) In addition to the annual audits conducted under this section, upon the request of the secretary of state or the appropriate board of elections, the auditor of state shall conduct an additional audit of a county's voter registration system for the entire county or for a particular precinct or precincts.

(E) The report, findings, and recommendations for each audit conducted under this section shall be made available to the public on the official web sites of the auditor of state and the secretary of state.



### INTERESTED PARTY TESTIMONY Senate Bill 153 (SB153) Interested Party Testimony Training not adequate to authenticate identification

- Chairperson and Members of the Committee:
- Thank you for the opportunity to submit interested party testimony for Senate Bill 153. I am Sue Mazzarini from Fairfield County.

Election officials and poll workers are not required to be trained to identify or authenticate citizenship documents nor are copies of proof of citizenship verified with source databases, increasing the risk of accepting invalid documents as verified proof of citizenship

From personal experience working as a poll worker in numerous elections, prior to and after Secretary LaRose's directive on accepting proof of citizenship documents at the polls, I personally observed that the BOE failed to train non-citizen identification on drivers licenses. I brought this to the attention of the BOE which responded stating it was not a poll workers function to screen for such demarcation. After a complaint to the SOS, the BOE then started training on non-citizens drivers licenses and added the naturalization paper as additional documentation to verify, yet no additional training was offered to those who had been previously trained. We as poll workers have never seen naturalization documentation; therefore, we could not ascertain authenticity of such.

- To address this issue, I respectfully urge the committee to consider the following amendment to SB153:

Since copies may be easily falsified with modern technology, before acceptance, copies of documentary proof of citizenship (DPOC) must be cross-verified with relevant federal or state databases to confirm authenticity. Temporary poll workers should not be responsible for verifying documents presented as proof of citizenship. Based on my experience as a poll worker, I do not have confidence that **only** citizens will be voting in Ohio if temporary workers are expected to verify something as important as citizenship using only documents – or even copies – claiming to be proof of citizenship. Verification should be conducted by more qualified and properly trained Board of Elections officials or consider it appropriate to add the fact that ANY elector wishing to vote can ALWAYS vote a provisional ballot and provide the documentation to the BOE within the 4 day curing process.

- Thank you for your time and consideration.



## Poll Workers Verifying Proof of Citizenship Documents Would Lead to Widespread Issues

Interested Party Testimony on Senate Bill 153 May 27, 2025

### Poll Worker Verification of Proof of Citizenship Documents Would Lead to Widespread Issues

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the General Government Committee:

Thank you for the opportunity to provide testimony for Senate Bill 153. My name is Scott Taylor and I have served as a temporary poll worker in Montgomery County for seven years. During that time I have served as a Precinct Election Official (PEO), Voting Location Manager (VLM) and a Polling Location Supervisor (PLS). I am here today to respectfully raise serious concerns about the provision in SB153 that would require poll workers to verify proof of citizenship documents at polling places.

**While I fully support ensuring that only U.S. citizens vote, polling places are not the appropriate time and place for verifying citizenship documents, and would lead to widespread issues at polling sites across the state.**

Imposing a new responsibility on poll workers to verify citizenship would disrupt the voting process, create confusion for both voters and workers, and increase the risk of errors – either mistakenly verifying someone’s citizenship or wrongly rejecting valid documents, potentially disenfranchising eligible voters.

Under the Secretary of State’s rule for the November 2024 election, voters flagged with a “Noncitizen” designation on their driver’s license or state ID can cast a regular ballot—rather than a provisional one—if they bring a document – or a copy of a document – showing U.S. citizenship to the polls. While this might seem like a reasonable safeguard, it places an unreasonable burden on temporary poll workers, who are not trained or equipped to verify the authenticity of legal documents.

Most poll workers receive minimal training, limited to a few hours. We are not legal experts, document examiners, or immigration officers. Asking us to review and validate various types of proof of citizenship—documents that may vary over time and contain legal terminology, —is a recipe for confusion and inconsistency.

Expecting poll workers to visually verify citizenship documents will almost certainly lead to:

- Errors in judgment, potentially turning away eligible voters;
- Inconsistent application of the law across counties;
- Longer lines and delays, as verification attempts slow down the check-in process.
- Disputes and legal uncertainty, undermining trust in the electoral process.
- *[And the go-to when you are not sure]* Rubber-stamping any document or copy presented as proof of citizenship.

This responsibility belongs with trained election officials—not temporary workers.



## Proposed Solutions:

- Voters whose citizenship status cannot be verified before Election Day should cast a provisional ballot. This ensures that eligible voters can still participate while giving Boards of Elections staff – that should be properly trained in document review – the time and authority to verify citizenship accurately.
- Prohibit poll workers from visually verifying proof of citizenship at polling places. It is both inappropriate and unsustainable to place this responsibility on individuals with limited training [*who might just rubber stamp it*]. Doing so jeopardizes the integrity, consistency and fairness of the voting process.
- Assign all verification of documentary proof of citizenship to permanent, professionally trained Board of Elections officials. Poll workers should focus on their primary role of helping voters cast their ballots efficiently and securely – not interpreting legal documents.

In conclusion, I take great pride in helping my community during elections. But requiring poll workers to verify citizenship documents would make our jobs unmanageable, harm voters, and compromise the integrity of our elections. I respectfully urge this committee to reconsider this provision of SB153.

Thank you for your time and consideration.

Respectfully,  
Scott A. Taylor  
Temporary Poll Worker, Montgomery County



## Poll Workers Should Not Be Tasked With Verifying Citizenship

### Interested Party Testimony on Senate Bill 153 Poll Workers Should Not Be Tasked With Verifying Citizenship

Chairperson Roegner, Vice Chairperson Gavarone, Ranking Member Blackshear, and members of the Committee DeMora, Huffman, Reinke, Timkin:

I appreciate the opportunity to testify today. My name is Martha Cooper, and I live in Fayette County. I want to begin by commending the members of this committee – and the legislature more broadly – for taking steps to uphold the will of Ohio voters by codifying the requirement that only US citizens may vote in our elections.

In 2022, Ohioans overwhelmingly approved a constitutional amendment affirming that voting is a right reserved exclusively for US citizens. By placing this mandate into clear statutory language, you are ensuring that our election laws align with the Ohio Constitution and reflect the expressed will of the people.

That is why it is so important that any implementation of this mandate be both meaningful and effective. As written, SB153 does not sufficiently ensure that only US citizens are voting, particularly regarding the role of poll workers (also known as precinct election officials) in verifying proof of citizenship documents.

Precinct election officials are responsible for ensuring that voting is conducted fairly, securely and in accordance with state and federal law. However, requiring them to adequately verify something as critical as a voter's citizenship status through visual inspection alone – without access to official databases – is both unrealistic and ineffective.

A simple sight review of a photocopy cannot confirm citizenship. How can a precinct election official determine whether a document is authentic or a convincing counterfeit?

I observed the November 2024 election at a polling location in Franklin County. It appeared very well run and anyone bringing papers was usually referred to the Voting Location Manager (VLM) for next steps. Often the voter was sent to the provisional table.

I have had poll worker training and have reviewed the Training manual from the Secretary of State that shows pictures of where to look on the back of a driver's license or state ID to determine whether the voter is designated as a non-citizen.

Most check-in workers did look at the back of the ID card, but not everyone.

I voted in the May 2025 primary.

After the poll worker looked at my driver's license, I said that the worker did not check to make sure that I was a US citizen. I was asked how to check and showed them where to look on the back.



These two examples are in no way to raise red flags on the poll workers observed or interacted with.

My point is that there are a lot of activities at check-in.

Let's assist the poll workers process though long lines of waiting voters in an efficient manner and know beforehand who is and is not a US citizen.

They should not be responsible for deciding a voter's citizenship status. Implementing this process would help streamline check-in procedures and help ensure only US citizens vote in Ohio elections.

For these reasons, Senate Bill 153 must be amended to remove the responsibility of verifying citizenship from precinct election officials at the polls.

Again, I appreciate your leadership and your attention to this critical matter. Best wishes.



## Senate Bill 153 Interested Party Testimony

General Government Committee May 27, 2025

### **Facts Surrounding the Voter Registration Process not corrected in SB 153**

**Presented by Allison Nickolai- Miami County Ohio resident and registration process analyst.**

Good afternoon, Chair Roegner and Members of the General Government Committee. I'm Allison Nickolai from Miami County, Ohio, and I'm here because our voter registration process is at risk with some of the measures in SB 153. Voter registration is meant to ensure only eligible Ohioans—those over 18, residents, and U.S. citizens—can participate in the Ohio Elections process, while maintaining accurate voter rolls as mandated by federal law to protect election integrity. But Ohio's system is already broken, riddled with gaps in training and accountability that you have heard or will hear testimony on that make it hard to keep those rolls accurate, validation consistent, and impossible to guarantee that Only US Citizen Votes count. Senate Bill 153 doesn't fix these issues—it makes some items worse, undermining both the federal mandate and public trust in our democracy. I've got four concerns, backed by data and analysis, and I'm asking you to amend this bill to deliver true election integrity without restricting lawful access to the ballot.

#### **First, non-citizen credentials are surging and Non-Citizens are on the voter rolls.**

In 2023, Ohio had 224,000 valid non-citizen driver's licenses and IDs on the Department of Public Safety (DPS) records. By 2024, that number hit 236,000, up about 1,000 a month. In 2025, it's skyrocketed to 304,000, a jump to 5,000 monthly. Worse, Social Security Number (SSN) verification failures cited on the HAVV weekly reports during registration rose from 49% in 2023 to 64% at the end of 2024. The problem is, that the voter registration has already been issued a voter ID number. That's a glaring sign our system's struggling to confirm voter eligibility, especially citizenship. SB 153 does nothing to address this—it lets these gaps grow, threatening the accuracy of our voter rolls and federal requirements. We need stronger verification to keep our elections secure and non citizens off the voter rolls. Any registration not validated for citizenship should be flagged to vote provisional until the record is fully validated.

#### **Second, SB 153 is a step backward on registration ID policies.**

Ohio's current rule—only accepting Ohio credentials for voter registration—sets a high standard for accuracy. SB 153's proposal to allow expired or out-of-state IDs is a clear regression. It violates 52 USC 21083 of the Help America Vote Act (HAVA), which requires a valid driver's license or Social Security number and prohibits accepting registrations without them. Our county Boards of Elections can't verify out-of-state IDs—they don't have access to the databases needed. That's the Secretary of State's job. This change risks errors, delays, and ineligible voters slipping onto the rolls,



making an already flawed system weaker. If you cannot validate an Ohio driver's license for verification of citizenship, how on earth can we expect BOE's or the SoS to verify or validate an out-of-state license?

### **Third, unverified registrations- a HAVA "Black Hole".**

When a registration lacks a valid driver's license or Social Security Number, it still gets a "unique voter ID" per HAVA and goes straight onto the rolls, with no provisional flag. I call this a "validation black hole" because no one can confirm eligibility without it, especially citizenship. This isn't a small problem—it directly undermines the integrity of our voter rolls and the eligibility of those electors. If thousands of unverified registrations pile up and are voting, it erodes trust in our elections by diluting the votes cast by eligible electors. SB 153 fails to close this gap, letting our broken system fester. We need strict rules to ensure every registration is vetted properly or is required to vote provisional and counted only after the record has been corrected and validated.

### **Fourth, voter roll discrepancies.**

The Secretary of State's dashboard and county voter rolls don't line up, with over 75,000 unvalidated registrations statewide in some state of BMVSSA non match status. Some of these records are from 2021 and earlier. Federal law demands accurate rolls, but these mismatches raise serious doubts about who's eligible to vote. This isn't just a data glitch—it threatens secure election outcomes. SB 153 ignores this, failing to deliver the reform Ohio needs. We must reconcile each record on the voter rolls that have not been validated to restore confidence in our voter registration system.

In closing today, we must protect our access to the ballot from being exploited (preventable by validation) during the registration process. Voter registration should guarantee eligibility before access to a regular ballot. Surging non-citizen credentials—and the validation failure rate—show we're struggling to verify citizenship. Allowing out-of-state IDs, is a regression to current procedure. The "validation black hole" of unverifiable registrations further threaten our voter rolls' integrity. SB 153 doesn't fix the process that causes these flaws—it skirts the federal mandate for accurate voter rolls and erodes public trust in our elections. I urge you to amend SB 153 to strengthen voter roll validation by requiring a valid Ohio driver's license/ID, using SSN only if a driver's license doesn't exist, and give counties the database access they need for validation of registrations. I will provide more details supporting the facts presented here at your request and will gladly answer any questions you may have.

Thank you for your time, attention and focus on Ohio's elections.



## Senate Bill 153 Interested Party Testimony

### Falls Short of Secretary LaRose's Recommendations on Citizenship and Voter ID Verification

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

I appreciate this opportunity to provide testimony on Senate Bill 153 as an interested party concerning voter registration procedures.

As a previous poll worker, I was aware and had read the SoS directive 2024-09 in June 2024 <https://www.ohiosos.gov/globalassets/elections/directives/2024/directive-2024-09-november-readiness-election-administration.pdf> that specifically required poll workers to be trained on the identification of non-citizen photo ID's presented. We had already conducted 3 elections without that training.

This issue is important to me as I believe, because I questioned my Board of Elections training (or lack of) on non-citizen identification for the 2024 election, there began a process to eliminate me from working the polls that year. Intimidation tactics were used and I was left feeling disenfranchised.

In an August 2024 press release and letter, Secretary of State LaRose urged legislative leaders to take three critical steps to improve election integrity: (1) Enforce Ohio's citizenship requirement by verifying U.S. citizenship **before** adding voters to the rolls, (2) Improve Ohio voter roll accuracy by placing voters in provisional voting status if their registration cannot be verified through BMV or SSA records, and (3) Address ballot drop box issues.

The following describes how SB153 fails to meet Secretary LaRose's first two requests:

**#1 No Citizenship Verification Before Registration:** SB153 does not attempt to require verification of citizenship **before** registration. This omission places Ohio out of compliance with the National Voter Registration Act's requirement to maintain "accurate and current" voter rolls.

#### Key Issues in SB153:

- **Driver's License or State ID (DL/ID) Registrants:** Over 305,000 noncitizens in Ohio hold valid DL/IDs and are automatically registered to vote unless they opt out, per federal law. SB153 defers citizen verification to a post-registration review by the Secretary of State – a slow, opaque process involving repeated communication with local Boards of Elections and registrant proof of citizenship document requests. This risks misidentifying noncitizens as eligible voters.
- **Last Four Digits of Social Security Number (SSN4) Registrants:** In 2024 alone, 62,000 voters registered using SSN4, with over 900,000 such registrations since 2010. SB153 does not require verification against Social Security Administration (SSA) citizenship data, despite a federal directive making this information available. As a result, eligible citizens face unnecessary burdens to present proof of citizenship documents to vote, while election officials and poll workers must "verify" such documents by visual inspection alone. This inefficient and error-prone process risks misidentifying noncitizens as eligible voters.
- **Unverifiable ID or No ID Registrants:** Individuals registered with unverifiable DL/ID or SSN4 data, or no ID at all, as permitted by federal law - cannot be cross-checked for identity or citizenship verification through BMV records. SB153 does not require these individuals to be verified against relevant federal databases. Instead, "verification" relies solely on visual inspection of citizenship documents, increasing the risk of misidentifying noncitizens as eligible voters.

In summary, SB153 allows individuals to be registered without verifying citizenship, undermining voter confidence and failing to uphold the integrity of Ohio's elections.

**#2 Unverified or Mismatched Information on the Voter Rolls:** 39,000 voters registered with unverifiable SSN4 or mismatched information in 2024 alone. Additionally, Secretary LaRose acknowledged 'numerous' registrations with data that does not match BMV or SSA records. Despite these discrepancies, such voters can cast absentee ballots using the same unverified data.

**Key Issues in SB153:**

- The bill continues to verify identity only **after** registration, rather than before registration.
- The bill places **new** voters with unverifiable or mismatched data in provisional voting status, but not existing voters with the same issues. Only existing voters who change their name or address are subject to provisional voting status.

This creates a double standard: one voter with unverifiable information is required to vote provisionally, while another with the same issue is not. This unequal treatment violates principles of equal protection under the US Constitution and allows tens of thousands of potentially ineligible voters to vote regular ballots – contrary to the Secretary's recommendations.

I respectfully request the following amendments to SB153:

- Require verification of US citizenship and eligibility **before** registration.
- Verify **all** existing registrations against BMV and SSA records. Any registration that cannot be verified must be placed in provisional status until the discrepancy is resolved.

Ensuring that only eligible citizens vote in Ohio elections is essential to upholding public trust. Verifying citizenship and valid ID at the time of registration – and not after – is a common-sense step toward stronger election integrity.

Thank you for your attention to this issue. I urge the committee to adopt these amendments to ensure transparency, fairness and confidence in Ohio's elections.

Sincerely,



Sue Lindeman  
Knox County



## Technical Errors May Allow Ineligible Voters to Cast a Regular Ballot

### Senate Bill 153 Interested Party Testimony Technical Errors May Allow Ineligible Voters to Cast a Regular Ballot

Chairperson Roegner, Vice Chairperson Gavarone, Ranking Member Blackshear, and members of the Committee:

As an interested party dedicated to ensuring the clarity and integrity of Ohio's voter registration and voting processes, I submit Senate Bill 153 (SB 153) testimony.

SB 153 expands the circumstances under which voters are placed in provisional voting status, requiring all such reasons to be resolved before a voter can cast a regular ballot. However, certain provisions in the bill may be misinterpreted to imply that resolving a single provisional status indication removes the need for a provisional ballot entirely, even if other provisional status indications remain unresolved.

This ambiguity could lead to improper issuance of regular ballots to voters who have not fully resolved all underlying issues, undermining the bill's intent of provisional ballots. To address this concern, an amendment is proposed that explicitly states the removal of one provisional voting status indication does not permit a voter to cast a regular ballot unless all other provisional status indications are also resolved.

Additionally, the following are examples of language in SB 153 in need of clarification to avoid misrepresentation. Proposed language in green font would provide such clarification.

#### **Sec. 3503.201**

(D) Upon receiving a report from the secretary of state under section 3503.152 of the Revised Code, indicating that the secretary of state has verified that the applicant is a United States citizen, the board shall do all of the following:

- (1) Indicate in the elector's registration record that the elector's United States citizenship has been verified;
- (2) Remove the indication that the elector must vote by provisional ballot **due to unverified US citizenship**. If the board receives the report during the period beginning on the forty-sixth day before an election and ending on the day before the day of the election, the board shall remove the indication as soon as possible after receiving the report.
- (3) Notify the elector, on a form prescribed by the secretary of state, that the elector's United States citizenship has been verified. The notice required under this division may be included in the acknowledgment notice described under division (C) of this section if the board has not yet sent the elector an acknowledgment notice.

#### **Sec. 3503.202.**

(C) When the board has verified all of the information the board is required to verify concerning an elector under division (B) of this section, the board shall correct or update the elector's registration, as applicable, and shall remove the indication that the elector must vote by provisional ballot **under division (B) of this section**.

This amendment strengthens SB 153 by providing clear guidance to Boards of Elections regarding provisional ballot indications. I respectfully request the committee to adopt this amendment to enhance the reliability of Ohio's elections.

Thank you for your consideration.

Sincerely,

Elizabeth A. Burwell  
Hamilton County

### Interested Party Testimony for Senate Bill 153

## Fails to Align with President Trump's Executive Order 14248

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

I appreciate the opportunity to provide testimony regarding Senate Bill 153 (SB153). I am participating as an interested party who supports efforts to strengthen the integrity of our elections, while also calling for improvements to ensure Ohio elections are accurate, secure and in alignment with federal guidelines.

SB153 proposes changes to Ohio's voter registration system. However, it currently falls short in several critical areas when compared to Executive Order 14248 (EO), titled *"Preserving and Protecting the Integrity of American Elections,"* issued by President Donald J. Trump in March, 2025. These gaps risk undermining the integrity of Ohio's voter rolls and public confidence in the electoral process.

#### Key Areas of Concern

- 1. Lack of Required Documentary Proof of Citizenship (DPOC):**  
EO requires documentary proof of citizenship for all voter registrations; **SB153** does not.
- 2. No Tracking or Recordkeeping Requirement for DPOC:**  
EO requires tracking of the type of DPOC and related information; **SB153** does not.
- 3. Acceptance of Expired Driver's Licenses and State IDs:**  
EO does not include the use of expired driver's licenses or state IDs as DPOC;  
**SB153** allows.
- 4. Acceptance of Out-of-State Licenses:**  
EO does not include the use of out-of-state driver's licenses as DPOC;  
**SB153** allows.
- 5. Limited Access to Department of Homeland Security (DHS) Database Systems:**  
EO requires DHS to make systems available to state and local election officials for citizenship verification;  
**SB153** does not codify local-level access to DHS systems, and limits state-level access to the DHS SAVE program – only for confirming noncitizen status of individuals flagged through BMV records.
- 6. No Access to Social Security Administration (SSA) Databases:**  
EO requires SSA to make relevant databases available to state and local election officials for eligibility verification;  
**SB153** does not codify state or local level access to these databases.
- 7. No Access to Secretary of State Databases:**  
EO requires the Secretary of State to make relevant databases available to state and local election officials for citizenship verification;  
**SB153** does not codify state or local access to these databases.



To address these Key Areas of Concern, an amendment is necessary to bring SB153 into alignment with President Trump's federal Executive Order 14248, including:

**1. Require DPOC access for all new and existing voter registrations:**

For any individual whose US citizenship cannot be verified through an official federal or state database, DPOC must be submitted, or a hearing requested with the submission of alternative proof of citizenship evidence.

If a copy of DPOC is provided, it must be verified by Boards of Elections officials to an official federal or state database, with a tracking and recordkeeping process.

If an original or official copy of DPOC is submitted, it must be verified by a properly trained Board of Election official with a tracking and recordkeeping process.

For new registrations, the applicant must be placed in a "pending file" until the applicant meets all all eligibility verifications. For existing registrations, the registrant must be placed in provisional ballot status until the registrant meets all eligibility verifications.

**2. Prohibit Expired or Out-of-State IDs as DPOC:**

Expired or out-of-state driver's licenses shall not be accepted as proof of citizenship.

**3. Codify Full Access to Federal and State Verification Systems:**

Grant state and county Boards of Elections officials full access to all relevant federal and state databases necessary to verify the eligibility and citizenship of new applicants and existing registrants. This includes, but is not limited to, databases and systems maintained by the DHS, SSA and Secretary of State.

Ensuring that only eligible U.S. citizens are registered to vote is a constitutional obligation. While SB153 takes initial steps, it must be strengthened to meet the expectations of Ohio voters after overwhelmingly passing the amendment to Ohio's Constitution to ensure "only" Ohio citizens vote in Ohio elections over two years ago. Additionally, SB153 must align with established federal law and guidance. By adopting the proposed amendment, the General Assembly can close these gaps and enhance voter confidence across the state.

Thank you for your time, attention, and service.

Respectfully submitted,

*Eileen Watts*

Delaware County

**Interested Party Testimony on Senate Bill 153**

**Failure to Utilize Federal Resources to Verify Voter Eligibility**

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

I appreciate the chance to offer interested party testimony on SB153 and the legislature's efforts to improve the integrity of Ohio's elections, particularly in ensuring that only eligible U.S. citizens are registered to vote.

Currently, only individuals with Ohio Bureau of Motor Vehicles (BMV) records are screened and the Department of Homeland Security's Systematic Alien Verification for Entitlements (SAVE) program is used to confirm the status of noncitizens with BMV records. This limited process fails to cover a significant number of both new and existing voters who lack BMV records, leaving a substantial gap in verification.

This represents a missed opportunity to use comprehensive and already-available federal resources to verify voter eligibility. President Trump's Executive Order 14248 explicitly directs the Commissioner of Social Security, the Secretary of Homeland Security, and the Secretary of State to make all relevant federal databases available to state and local election officials for the purpose of verifying citizenship and voter eligibility.

To address this shortfall, I respectfully urge the Committee to amend SB153 to require the use of all relevant databases to verify both new voter registration applicants and existing registrants. This should include the Ohio BMV database, the Social Security Administration (SSA), and other applicable federal and state records. This approach enhances election security by using authoritative data sources and ensures that all registrants are held to the same verification standard, regardless of their registration method or BMV record status. It also aligns with the President's Executive Order, reduces reliance on paper documentation, eases the administrative burden on election officials, and strengthens compliance with both federal and state laws.

By fully utilizing all available federal and state data, Ohio can close existing verification gaps and better protect the integrity of its elections. I encourage the Committee to consider this amendment as an essential step toward that goal.

Thank you again for your leadership and commitment to election integrity.

Respectfully,

Donna Cecil  
Hamilton County



## Noncitizen Review is Limited and Does Not Identify All Noncitizens

Senate Bill 153 Interested Party Testimony May 27, 2025

### Noncitizen Review is Limited and Does Not Identify All Noncitizens

Chair Roegner and members of the Committee:

Thank you for the opportunity to submit testimony regarding Senate Bill 153 and its provision for a Noncitizen Review of Ohio's voter rolls. I submit this testimony as an interested party, deeply concerned with protecting the integrity and accuracy of Ohio's elections through proper citizenship verification of all registered voters.

While the intent behind the Noncitizen Review is commendable, the current structure of the review is limited and insufficient to ensure that only US citizens remain on Ohio's voter rolls. The bill fails to conduct a comprehensive review of all voters' citizenship status and introduces gaps that may allow noncitizens to remain registered and potentially vote in Ohio elections.

Key deficiencies include:

**1. Exclusion of Entire Voter Groups:**

- Voters who registered using the last four digits of their Social Security number (SSN4) are not included in the review. In 2024 alone, over 60,000 such registrations were submitted, with 39,000 showing integrity issues such as invalid or mismatched information. Since 2011, nearly 900,000 voters have registered via SSN4, none of whom have been verified for citizenship.
- Voters who registered using invalid driver's license or ID numbers are omitted.
- Voters who registered without providing any identification are not included. These categories present substantial risk and must be addressed.

**2. Inadequate Verification of Citizenship Proof:**

- SB153 does not re-evaluate those whose citizenship was "visually verified" through documents presented to temporary poll workers or board employees, which risks incorrectly accepting noncitizens.
- These documents are not verified against federal databases, such as those made accessible through Executive Order 14248.

**3. Flawed Dependence on BMV and SAVE:**

- The review depends exclusively on Bureau of Motor Vehicles (BMV) records to flag noncitizens, which are only reviewed when a voter updates their registration.
- BMV deputy registrar offices may inconsistently mark citizenship status
- The SAVE database, while useful, is limited in scope and was designed for entitlement verification, not electoral integrity. It is not comprehensive of all noncitizens.

These loopholes and omissions threaten the security and credibility of Ohio's elections and limit the efficacy of the Noncitizen Review.

### Proposed Amendment: Implement a Comprehensive Citizenship Status Review

We respectfully urge the Committee to consider amending SB153 to replace the limited Noncitizen Review with a Comprehensive Citizenship Status Review. This enhanced review would:

- **Include all voters**—not just those with valid Ohio driver's licenses and state IDs - ensuring that no group is overlooked due to registration method or administrative error.
- **Utilize all available federal databases**, including those authorized through Executive Order 14248, to verify citizenship beyond state-level records.
- **Provide transparency and accountability** by requiring the Secretary of State to report review results to county Boards of Elections and publish redacted versions publicly.
- **Accurately categorize voter records** as citizen, noncitizen, or unverifiable, with follow-up actions on the latter two as currently indicated in SB153.
- **Correct erroneous determinations** made by visual inspection or incorrect BMV records.



- **Conduct reviews monthly**, and daily within 46 days of any election, to ensure the integrity of upcoming electoral processes.
- **Create exemptions** for verified citizens to prevent redundant review, unless new, credible information challenges their status.

Even if citizenship verification is later implemented as a prerequisite for voter registration, the Citizenship Status Review remains a vital safeguard. The risk of fraudulent or falsified documents, administrative errors, and mismatches between state and federal systems will persist. Only through continuous, systematic verification can Ohio ensure that its voter rolls reflect accurate, up-to-date citizenship data.

Ensuring that only U.S. citizens vote in Ohio elections is foundational to public confidence in our democratic process. A limited review that excludes large groups of potentially ineligible voters is insufficient. We urge the Committee to adopt a robust, transparent, and comprehensive Citizenship Status Review as an amendment to SB153.

Thank you for your consideration on this important issue.

Sincerely,

*Charis Peterson*  
Butler County Ohio

**Senate Bill 153  
Interested Party Testimony**

**Inconsistent Voter Verification Standards Allows Votes from Unverified Voters**

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for the opportunity to testify on SB153. I'm here to raise a concern about a serious issue in Ohio's voter registration process that is inadequately addressed in this bill: the lack of eligibility verification for many existing voters.

Under current law, individuals with an unverifiable identification — including tens of thousands whose voter registration information does not match Bureau of Motor Vehicles or Social Security Administration records — can remain on the voter rolls and cast regular ballots. In 2024 alone, 39,000 individuals registered using invalid or mismatched social security information. These same individuals can also vote by mail using the same invalid credentials, with no further verification required.

In SB153, unless a voter changes their name or address, they may never be subject to such verification. New registrants are subject to stricter verification, while unverifiable voters remain under a lower standard. This inconsistency undermines both fairness and public trust.

I urge the committee to amend SB153 to include a comprehensive, data-driven eligibility review of **all** registered voters, using available federal and state records, to ensure compliance with the Ohio Constitution's requirement that only eligible citizens may vote. President Trump's March 2025 Executive Order supports this effort by directing federal agencies - including the Social Security Administration and Department of Human Security — to make available data for election verification on federal records.

A secure and fair election system requires that all voters are held to the same eligibility standard. With proper safeguards and support, Ohio can close this loophole and restore public confidence in our elections.

Thank you for considering this amendment to SB153.

Respectfully,

Emanuel Cecil  
Hamilton County



## Voting with Unverified ID Undermines Accurate Elections

### Senate Bill 153 Interested Party Testimony

#### Voting with Unverified ID Undermines Accurate Elections

Chairperson and members of the committee, thank you for the opportunity to provide interested party testimony on Senate Bill 153.

I respectfully recommend that Senate Bill 153 be amended to provide a clear and consistent message: any voter who has not been verified as having a valid form of identification must vote a provisional ballot until their records are corrected.

In addition, Board of Elections officials must be given the tools necessary to verify a voter's identification status ahead of elections. This includes access to records from the Ohio Bureau of Motor Vehicles and Social Security Administration to confirm whether a potential voter has valid US identification. Frankly, I was shocked to learn that Boards of Elections do not already have access to these records. How can we expect them to maintain accurate voter rolls without access to this critical information?

This is not about making it harder to vote—it's about ensuring integrity, consistency, and fairness in Ohio elections. Requiring all voters who registered with unverified or invalid ID to vote provisionally is a common-sense safeguard that protects the integrity of the vote.

This amendment to Senate Bill 153 would not deny any eligible citizen the right to vote—it simply ensures that their eligibility be verified before their ballot is counted. It is a reasonable and necessary step toward maintaining public confidence in our elections

I urge you to support this approach and to ensure that voters whose identification is not verified ahead of elections be required to vote provisionally until their records are corrected.

Thank you,

James Greenfield

Montgomery, Ohio



### Senate Bill 153 Interested Party Testimony

#### Signing a Petition from Ineligible Voters May Be Counted – Which Then Allows Ineligible Voters to Cast Regular Ballots

Thank you Chairperson Roegner, Vice Chairperson Gavarone, Ranking Member Blackshear, and members of the Committee for the opportunity to submit interested party testimony regarding Senate Bill 153 (SB153).

Current state law allows individuals to register to vote and sign a petition on the same day. We also know individuals are registered without verification of eligibility. While SB153 requires petition signers to be registered voters at the time of signing, it does not require those individuals to be verified as eligible voters – meaning US citizens, age 18 or older, and Ohio residents - for their petition signatures to count.

Under SB153, individuals are placed in provisional voting status if their US citizenship cannot be verified or if their ID doesn't match Bureau of Motor Vehicles or Social Security Administration records. These individuals must provide information and their eligibility must be verified before they can cast a regular ballot or have their provisional ballot counted.

Despite these safeguards for voting, these same individuals – whose identity, citizenship, or residency may be unverified – can still sign petitions to amend the Ohio Constitution, and their signatures will be counted.

How many unverified eligible individuals signed petitions that led to the recent constitutional amendments on abortion and marijuana rights? How many signatures from individuals with unverified citizenship, addresses, or identity will be counted toward the proposed Ohio Voters Bill of Rights constitutional amendment?

Even more concerning, a Secretary of State Directive allows provisional voting status to be removed once a petition signature is counted. As a result, any information that was previously required to verify the registrant's eligibility to vote a regular ballot is no longer required – **simply because they signed a petition – even if they were never verified as eligible to vote**. Let me give two troubling examples:

**Example 1 - Address Verification Loophole:** *Under current law, when a voter registers and their mailed Acknowledgment Notice is returned undeliverable – they are required to correct their address or vote provisionally. Yet, if that individual signs a petition, their signature counts if it matches their registration – and the requirement to verify their address is dropped. The voter may now cast a regular ballot despite no evidence of Ohio residency.*

**Example 2 - Unverified Identity via BMV Mismatch:** *Under SB153, if a voter's driver's license or state ID number does not match BMV records, then they move or change their name, they must correct the ID number or vote provisionally. But again, if they sign a petition, their signature counts if it matches their registration, and the requirement to resolve the ID mismatch is removed. They can then vote a regular ballot, without ever verifying their identity or citizenship.*



*NOTE - Under SB153, another loophole exists: If the voter with an unverifiable ID does **not** move or change their address, **they will not be subject to a review of their ID to BMV records that would place the voter in provisional voting status.** They can continue to cast regular ballots and sign petitions – without being required to verify their identity or citizenship – unless they update their registration.*

To address these serious concerns, **an amendment is necessary to prohibit the counting of petition signatures from voters in provisional status at the time of signing**, unless the individual submits the required information to the Board of Elections before the petition is submitted, and the Board of Elections properly verifies and updates the registration, such that the individual is no longer required to vote provisionally. This amendment is essential to prevent petition signatures from being accepted from individuals who are ineligible to vote in Ohio.

We may never know how many ineligible voters' signatures were counted in the constitutional amendment campaigns for abortion and marijuana rights, or how many will be counted in the proposed Ohio Voters Bill of Rights amendment. But what we do know is this: **State legislators must not allow another petition campaign to proceed without ensuring that only individuals who are fully eligible to vote in Ohio have a say in changing its Constitution – the supreme law of the state.**

Thank you for your consideration in this very important matter.

Respectfully Submitted,

James Roush  
Hamilton County

## Verify before Register Eliminates the Potential for Noncitizens in Ohio Voter Rolls

### Senate Bill 153 Interested Party Testimony Eliminating the Potential for Noncitizens in Ohio Voter Rolls

To the Honorable Members of The Ohio Senate General Government Committee:

As a concerned citizen and interested party, I appreciate the opportunity to provide testimony for Senate Bill 153 on the critical issue of voter registration integrity. Ensuring that only eligible citizens participate in our elections is fundamental to maintaining public trust.

#### The Issue

SB153 As Introduced lacks up-front verification of United States citizenship ahead of adding an applicant to the voter rolls. While most applicants are eligible citizens, the absence of a standardized verification process before adding applicants to the voter rolls risks undermining confidence in election outcomes. Manual checks or reliance on self-reported information are insufficient in an era where technology enables efficient, secure data integration.

**What is the purpose of a “voter” registration database, if not verified eligible “voters” are permitted on the database?**

Other reasons to verify citizenship ahead of adding individuals to the voter rolls include the following:

1. **Administrative Burden:** Post-registration verification requires additional resources to investigate, contact voters, and remove ineligible individuals from rolls. This can strain Board of Elections staff, and lead to errors and delays. Pre-registration verification streamlines the process by filtering out ineligible applicants.
2. **Legal and Political Challenges:** Removing someone from voter rolls after registration can trigger accusations of voter suppression, especially if it appears certain groups are disproportionately targeted. Pre-registration verification reduces these risks by addressing eligibility before enrollment.
3. **Voter Confidence:** Allowing non-citizens onto voter rolls results in inaccurate voter rolls, even temporarily, which can erode public trust in election integrity, and does not align with The National Voter Registration Act requirement for accurate voter rolls.

#### Proposed Solution

Amend SB153 to require all new voter registrations be placed in a “pending file”, and all existing voter registrations be placed in provisional voting status until citizenship is confirmed through a secure, automated cross-check with authoritative federal databases. Provide an appeals process through a hearing with the Board of Elections to ensure no eligible voter is disenfranchised due to errors.

Verifying citizenship before registering ensures only citizens are registered, as Ohioans voted for when amending Ohio’s Constitution in 2022. Leveraging existing databases minimizes the need for individuals to provide documentary proof of citizenship.

Placing voter registrations in a pending file, and a one-time process placing existing voter registrations in provisional voting status until citizenship is verified through federal databases is a feasible, technology-driven solution to strengthen election integrity in helping to ensure a secure, fair and trusted electoral process. I urge this committee to consider adopting this approach.

Respectfully submitted,

*Cynthia Thompson*

Muskingum County



## Individuals are Added to the Voter Rolls BEFORE Verifying They Are Eligible to Vote

### Interested Party Testimony on Senate Bill 153

#### Individuals are Added to the Voter Rolls BEFORE Verifying They Are Eligible to Vote

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

As elections are a designated component of our nation's critical infrastructure, I appreciate this committee's efforts to improve the integrity of Ohio's elections. Unfortunately, SB153 does not close existing gaps that leave our elections vulnerable to malfeasance due to the lack of verification of identity and eligibility—specifically U.S. citizenship—**BEFORE** a name is added to Ohio's voter rolls. *Ohio banks do not allow an individual to access a bank account **BEFORE** verifying the individual's credentials. Why should Ohio's elections be any less secure?*

This practice is contrary to the public position of Ohio Secretary of State Frank LaRose in his August 29, 2024 press release, which called for citizenship verification before adding an applicant to the voter file.

It conflicts with President Trump's Executive Order 14248, which mandates that all state and local election officials verify the eligibility of voters using available federal databases prior to registration approval.

In 2024, the Department of Government Efficiency reported that 2.1 million noncitizens were issued Social Security numbers—many of whom voted. This raises serious concerns for Ohio, where no citizenship verification is required **BEFORE** individuals are added to the voter rolls. The current Annual Noncitizen Review, as codified in law, is only capable of identifying a small fraction of potential noncitizens.

To close this gap, I respectfully propose SB153 be amended to verify eligibility, which includes United States citizenship, **BEFORE** being added to the official voter rolls. Verification must include confirmation of a valid driver's license or ID, and a review of federal databases in accordance with Executive Order 14248.

This amendment fulfills the request made by Secretary LaRose to verify citizenship **BEFORE** registration is completed and aligns Ohio law with the President's Executive Order 14248, ensuring that only eligible U.S. citizens are added to the voter rolls,

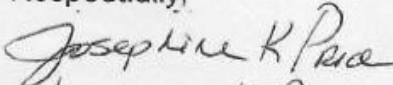
Without a clear mandate to verify citizenship and other eligibility verifications **BEFORE** voter registration, SB153 risks perpetuating the vulnerabilities already present in Ohio's voter registration system. The measures suggested by Secretary of State LaRose are not only necessary but also long overdue.

Adding voters to the rolls **BEFORE** verifying their eligibility is both unsound and unnecessary. The technology and legal authority exist to ensure proper verification **BEFORE** registration - what remains is the political will to implement it.

I urge the Committee to adopt this critical amendment and ensure Ohio's voter registration process begins with security, not shortcuts.

Thank you for your time and commitment to election integrity.

Respectfully,

  
JOSEPHINE K PRICE



### Interested Party Testimony on Senate Bill 153

#### Boards of Elections Cannot Verify Eligibility to Vote

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for the opportunity to submit interested party testimony regarding Senate Bill 153. While the intent to improve election integrity is commendable, the current draft of this legislation fails to address a major deficiency in Ohio's elections: it does not provide local election officials with access to databases necessary to verify eligibility—including U.S. citizenship—of individuals registering to vote or casting a ballot. This omission directly undermines the integrity of the voter rolls, but also places Boards of Elections in direct conflict with their responsibilities under federal law.

Currently, Ohio Boards of Elections:

- Do not have access to BMV records to verify an applicant's driver's license or state ID number,
- Do not have access to SSA records to verify the last four digits of the social security number,
- Do not have access to any database to verify the applicant resides at the stated address - or even that the address exists,
- Do not have access to any database to verify an applicant's date of birth matches the name provided,
- Do not have access to any database to verify the applicant is a U.S. citizen.

President Trump's Executive Order 14248 explicitly directs federal agencies—including the Social Security Administration and the Department of Homeland Security - to make all relevant citizenship and identity verification databases available to state **and local** election officials. Despite this, SB153 fails to incorporate any provision ensuring such access for Ohio's election officials. As a result, Ohio's Boards of Elections remain unable to lawfully access the very information needed to uphold the security and accuracy of our elections.

To correct this deficiency, **the Committee is urged to adopt an amendment to SB153 and require that all Ohio Boards of Elections be granted secure access to relevant databases to verify the eligibility of both new applicants and existing registered voters.**

This amendment would ensure compliance with the President's Executive Order, equip local election officials with the tools necessary to fulfill their legal responsibilities, and reinforce voter confidence through greater transparency and accountability.

Election integrity cannot be upheld if those tasked with protecting it are denied the fundamental tools to do so. Providing access to these verification systems is not optional—it is a necessity.

Thank you for your attention to this critical issue, and for your commitment to improving Ohio's elections.

Respectfully submitted,

Mary Cullison  
*Mary Cullison*



### Senate Bill 153 Interested Party Testimony

#### Unequal Application of Identification in the Voter Registration Process

Chair Roegner and members of the General Government Committee:

Thank you for the opportunity to submit Interested Party testimony on Senate Bill 153 and the broader effort to ensure fair and uniform application of Ohio election law.

SB153 treats voters differently depending on the type of identification they use when registering to vote:

- Voters who register using an Ohio driver's license or state ID have their identity and citizenship status processed and verified through a database, specifically The Bureau of Motor Vehicles (BMV) records.
- However, voters who register using the last four digits of their social security number do not have their identity and citizenship status processed and verified through a database, even though a database exists and President Trump directed the Commissioner of the Social Security Administration to make relevant information available from such a database to state and local election officials for election purposes<sup>1</sup>.

Instead, voters who register using the last four digits of their Social Security Number are required to provide documentary proof of citizenship (DPOC).

This creates a two-tiered system of voter registration, where voters using equally valid forms of identification face unequal burdens. It penalizes those who do not have a driver's license or state ID by requiring them to provide documentary proof of citizenship.

This disparity raises significant concerns of unequal treatment under the law, violating the principle that similarly situated voters should be treated the same. It also increases the administrative burden for both voters and Boards of Elections.

To address this disparity, I recommend that SB153 be amended to authorize the use of Social Security Administration (SSA) verification to confirm identity and citizenship for individuals registering with the last four digits of their social security number.

Respectfully Submitted,  
Greg Fraley  
Hamilton County

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<sup>1</sup> President Trump Executive Order 14248, March 25, 2025

## Why are Out-of-State Issued IDs Considered Proof of Citizenship in Ohio?

### Senate Bill 153

Interested Party Testimony, Tuesday, May 27, 2025

#### *Why are Out-of-State Issued IDs Considered Proof of Citizenship in Ohio?*

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for the opportunity to provide testimony as an interested party regarding Senate Bill 153. I appreciate your efforts to ensure only that only United States citizens vote in Ohio elections. However, I have serious concerns that SB153 allows the use of driver's licenses/state IDs (DL/ID) issued by other states as proof of citizenship to register and vote in Ohio.

I request that the committee consider amending SB153 to explicitly prohibit the use of out-of-state driver's licenses or state-issued IDs as proof of U.S. citizenship for voter registration and voting in Ohio for the following reasons:

- Beyond the obvious concern that a voter registering or voting in Ohio should present identification issued by Ohio – the state in which they intend to vote – there are significant problems with accepting out-of-state driver's licenses or IDs for this purpose. These licenses vary widely in the information they contain and the standards under which they are issued. Poll workers and Boards of Elections staff cannot reasonably be expected to verify or interpret citizenship indicators from 50 different states.
- There is no national standard or consistent indicator of citizenship status on driver's licenses. Some states may include or omit citizenship designations on driver's licenses and state IDs. This inconsistency opens the door to both unintentional error and intentional misuse when registering or voting.
- Ohio law already recognizes the importance of transitioning to in-state driver's licenses. New residents are required to surrender their out-of-state driver's license and obtain an Ohio license within 30 days if they intend to drive in the state. It is both contradictory and concerning for an individual to claim Ohio residency for voting purposes while continuing to hold a driver's license that legally identifies them as a resident of another state.
- Allowing out-of-state licenses to serve as proof of citizenship in Ohio sends conflicting messages about residency requirements and undermines the integrity of the voter registration process. Ohio has a legitimate interest in ensuring that only eligible citizens who are actual residents of the state participate in its elections.

Thank you for your consideration on this matter.

Respectfully submitted,

Gregory M Jevnikar



**Interested Party Testimony on Senate Bill 153**

**Lack of Board of Elections Training in Verifying Proof of Citizenship**

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for considering my Interested Party testimony on Senate Bill 153.

As currently written, SB153 overlooks a critical component necessary to uphold the integrity of citizenship verification in Ohio elections: training. Under the bill, election officials are not required to receive training on how to properly review and authenticate the Documentary Proof of Citizenship (DPOC).

The lack of training creates a serious vulnerability in the verification process. Without proper instruction, election workers may unintentionally accept fraudulent documents or reject legitimate ones. Additionally, acceptance standards may differ from county to county, violating equal protection under the law. The increasing sophistication of document forgery tools, paired with the wide range of acceptable citizenship documents, makes this an area where uniform, standardized training is essential.

The Committee may believe that this issue can be addressed through a Secretary of State directive; however, without the codification of required training risks leaving the security and accuracy of Ohio's election systems to a future Secretary of State who may not prioritize proper verification of documentary proof of citizenship.


I respectfully request the Committee to update SB153 and require all Boards of Elections (BOEs) to receive comprehensive training on identifying and verifying the authenticity of DPOC. This training should be standardized statewide and provided along with the implementation of any DPOC-related procedures.

Implementing this amendment promotes consistency in document review across all counties, reduces the risk of human error or fraud in verifying citizenship status, supports fair treatment of voters by ensuring eligibility is determined based on informed and accurate assessments, and increases confidence in Ohio's election security and oversight procedures.

Verifying citizenship is a serious responsibility that must be carried out with accuracy and accountability. That begins by equipping election officials with the knowledge and tools to carry out that responsibility. I encourage the Committee to include this update in SB153.

Thank you again for your attention to this important issue and for your work to improve Ohio's election systems.

Respectfully submitted,

  
Scott A. Greene

## Lack of Hearing Process

### Senate bill 153 Interested Party Testimony

#### Lack of Hearing Process

Chairperson Roegner and Members of the Committee:

Thank you for the opportunity to provide written interested party testimony on Senate Bill 153. While I appreciate the intent of SB153 to ensure that only eligible citizens vote, I urge the committee to consider an essential amendment: the inclusion of a formal hearing process for individuals who assert they are U.S. citizens but lack a traditional proof of citizenship document.

As currently written, SB153 provides no remedy or appeal process for individuals who believe they are US citizens, but cannot verify it through traditional documentation or centralized databases. This gap poses serious due process concerns and risks disenfranchising citizens who, for various legitimate reasons, lack standard documents such as birth certificates or naturalization records in searchable databases.

To protect the fundamental right to vote, an amendment to SB153 is proposed to establish a hearing procedure that includes the following:

1. Any applicant or registrant who asserts they are a U.S. citizen, but whose citizenship cannot be verified through conventional documentary evidence or electronic databases, may make a written request on a form prescribed by the Secretary of State to the Board of Elections requesting a hearing to determine the individual's citizenship. The request shall be accompanied by a sworn affidavit under penalty of perjury that the individual is a US citizen and eligible to vote in Ohio elections.
2. At the hearing, the individual may retain counsel, testify, present evidence, and call witnesses. Testimony will be under oath.
3. The Board of Elections will conduct an investigation to determine the truth or falsity of the matter, including checking all relevant databases and may subpoena witnesses. Third parties may present sworn testimony and evidence relevant to the matter.
4. Following the hearing, the Board of Elections promptly shall make a determination, by majority vote, whether the individual, by a preponderance of the evidence, is a United States citizen.

Denying individuals a fair opportunity to establish their citizenship—especially when they sincerely believe they are U.S. citizens—diminishes the values upon which our electoral system is built. A narrowly tailored hearing process is a reasonable, lawful safeguard that ensures eligible citizens are not excluded from voting simply because their records do not appear in a government database.

This amendment would strike a careful balance between maintaining election integrity and protecting individuals' access to the ballot. I respectfully urge you to support the inclusion of this hearing process in SB153.

Thank you for your attention to this matter.

Sincerely,

Dan Niederlehner  
Butler County



## Inconsistent Public Reporting if Registration is in Provisional Voting Status

### Interested Party Testimony on Senate Bill 153 Inconsistent Public Reporting if Registrations in Provisional Voting Status

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee

Thank you for the opportunity to submit testimony as an interested party on the issue of transparency in voter registration reporting, particularly regarding the inconsistent public disclosure of voter records placed in provisional status.

Under SB153, the Secretary of State is required to regularly provide reports to each Board of Elections concerning voter registrations that do not match Bureau of Motor Vehicles (BMV) or Social Security Administration (SSA) records. These voters are then placed in provisional voting status, and the Secretary of State is required to make this information publicly available on the SOS website, with limited exceptions for privacy and security.

However, for voters who are flagged as potential noncitizens, a different standard applies. While the SOS is required to report these individuals to the appropriate BOE and place them in provisional voting status, there is not a statutory requirement for making these reports publicly available on the SOS website - despite their direct impact on voter eligibility and participation.

This disparity weakens public confidence, and undermines the principle that all voter eligibility should be subject to the same level of transparency and accountability.

#### Transparency Is the Foundation of Trust

In a system built on transparency and public trust, consistent, accessible, and verifiable reporting is essential to safeguard against error, abuse and mistrust.

Information about a voter's provisional status is public information. If information about a voter's provisional status due to a mismatched ID or outdated address can be reported publicly, then similar standards should apply to reports involving potential noncitizenship.

#### Proposed Solution: Amend Reporting Requirements

An amendment to require the Secretary of State to publicly report on the SOS website, information about voters flagged as potential noncitizens—on the same standards as reports related to ID mismatches.

This amendment would ensure consistency and accountability in the handling of provisional voter status. It would also affirm Ohio's commitment to fair, nonpartisan election administration, and ensure that all voters are treated equally in the reporting and resolution of eligibility concerns.

In conclusion, I urge this Committee to support a straightforward amendment to ensure consistent public reporting of provisional voter statuses, regardless of the underlying reason. Transparency strengthens our electoral process and protects both voter confidence and election integrity.

Thank you for your time and consideration.

Respectfully,



Laurie Groves

## Prior Voter Registrations May Not Be Authorized for Cancellation

### Interested Party Testimony on Senate Bill 153 Prior Voter Registrations May Not Be Authorized for Cancellation

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for the opportunity to provide Interested Party testimony on Senate Bill 153 and its impact on the integrity of Ohio's voter rolls.

While SB153 took a first step by requesting voters to list their previous address on the registration and update form, and stating that election officials will be notified of any address change, the form does not clearly indicate an authorization to cancel a voter's prior registrations. This lack of clarity enables duplicate registrations to persist across counties or even across state lines, which distorts precinct sizes, turnout percentages, and redistricting data, while also increasing the potential for voter fraud.

Over 179,000 Ohio voters have submitted a USPS National Change of Address (NCOA) form, listing both their Ohio address and a new out-of-state address. Many remain on Ohio rolls for four or more years after moving, posing a risk of identity theft since NCOA data is commercially available to anyone.

To minimize these vulnerabilities, SB153 should be amended to include the following changes:

1. Update all voter registration and update forms and provisional ballots to include the following attestation: "I understand that if I am registered to vote at any other address, the election officials will be notified of my change of address. I authorize cancellation of all registrations previously issued in my name in this state and any other state."

This direct statement eliminates ambiguity and ensures clear voter consent, without requiring voters or officials to look up or interpret references to the Revised Code.

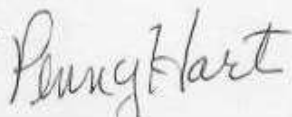
2. When a voter moves within Ohio and authorizes cancellation of their former registration, but the signature on file does not match the new registration, require the BOE at the new address to:
  - Send a notice to the registrant at the new address, explaining the issue, and
  - Request completion and return of an authorization form to finalize cancellation of the former registration.
3. When a BOE is notified of a voter who moves to another state and requests cancellation of their Ohio registration on the new state's form, but the signature in the new state is unavailable or does not match:
  - Require the Ohio BOE to send a forwardable notice to the voter's address (if USPS forwarding period has lapsed, use the new address provided),
  - Notify the registrant that cancellation was not completed due to signature mismatch or absence, and
  - Request that the registrant complete and return a signed authorization form to cancel their Ohio registration.

Thousands of Ohio voters routinely appear on citizen-led duplicate record queries—not due to coincidence, but because their former registrations were never properly canceled. Current law and procedures are unclear, incomplete, or inconsistently applied. SB153 is an important opportunity to close these gaps and protect the integrity of Ohio's elections.

By adding clear attestation language to all relevant forms and requiring follow-up where signatures cannot be matched, duplicate registrations can be prevented. This will reduce the risk of error and fraud, and improve public confidence in our voter rolls.

I urge the committee to adopt these commonsense updates as part of SB153. Thank you for your time and consideration.

Sincerely,





## Poll Workers Authenticating Citizenship Falls Short in Enhancing Election Infrastructure

### Interested Party Testimony on Senate Bill 153

May 27 , 2025

Topic: SB153 Falls Short in Enhancing Ohio's Critical Infrastructure Elections

**Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the General Government Committee:**

Thank you for the opportunity to provide Interested Party testimony on Senate Bill 153. My name is Tristan Trayton Hatfield and I served as a Pole Location Supervisor (PLS) during the May 6, 2025 primary election in Montgomery County Ohio. I am here today to express concern that SB153, while well-intentioned, does not go far enough to secure Ohio's voter registration system.

Under current law, voter registrations are added to the rolls without confirming identity or U.S. citizenship. BOEs lack access to the databases necessary to verify citizenship, and copies of documents are accepted without authentication, leaving our system vulnerable to fraud.

During my training as a poll worker I received no training regarding verifying an individual's citizenship by examining the individual driver's license as directed by secretary of state Frank LaRose in Directive 2024-09. This directive states that *"unacceptable forms of photo ID, including photo IDs issued to non-citizens. Ohio BMV issued photo IDs now contain a non-citizen notation on the back of the photo ID and license."*

Given my experience, what assurance is there that local boards of elections would provide adequate training for poll workers to adequately verify documentation showing that an individual is a U.S. citizen?

SB153 should be amended to:

- Require verification of identity and citizenship *before* registration.
- Give BOEs access to federal and state databases like SSA, SAVE, and BMV.
- Prohibit expired and out-of-state IDs as proof of citizenship.
- Train BOEs *not* poll workers to authenticate citizenship documents.

These changes would enhance transparency, and help restore public trust in our elections.

Thank you for your time and commitment to election integrity.

**Tristan Trayton Hatfield**

Montgomery Country

## **Interested Party Testimony on Senate Bill 153 Addressing the Unfunded Mandate on Ohio's Election Infrastructure**

Chair Roegner, Vice Chair Gavarone, Ranking Member Blackshear, and members of the Committee:

Thank you for the opportunity to provide Interested Party testimony on Senate Bill 153. I appreciate the legislature's continued commitment to strengthening the integrity of Ohio's elections. However, I must express serious concern that, as currently written, SB153 imposes an unfunded mandate on Ohio's county Boards of Elections.

SB153 proposes new procedures intended to verify voter eligibility and citizenship status—an objective I fully support. However, the bill does not allocate the necessary funding or technical resources to implement these procedures. This places an undue burden on local Boards of Elections, which are already responsible for managing the demands of election administration.

Since these measures are essential to protecting the integrity of our elections, then the General Assembly must recognize that the responsibility for funding them cannot fall solely on local officials. Verifying voter eligibility through enhanced database matching and handling additional documentation require upgrades in staffing, training, software, and data integration tools.

Expecting BOEs to carry out these expanded duties without additional state support is not only impractical—it risks undermining the bill's own objectives by overburdening the very infrastructure it seeks to improve. Elections are part of our nation's critical infrastructure, and deserve both robust policies and the funding to implement them effectively.

I respectfully urge the Committee to amend SB153 to include a clear funding mechanism to ensure these new responsibilities are carried out efficiently and equitably across all counties.

A secure, fair, and functional election system requires not just strong laws, but also the resources to enforce them.

Thank you for your consideration.

Sincerely yours,

Donna Young  
Hamilton County